

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,  
Debtor.

Case No. 23-13237-pmm

Chapter 11

**Debtor's Application to Employ Cibik Law, P.C. as Debtor's Counsel**

**AND NOW**, Applicant Tri-State Paper, Inc., by and through its principal, applies to this Court for entry of an order authorizing employment of a professional in accordance with L.B.R. 2014-1. In support of this application, the Applicant states as follows:

1. The Applicant is the debtor in the above chapter 11 bankruptcy case.
2. The Applicant seeks to retain Cibik Law, P.C. (the "Attorney") to serve as its counsel.
3. Employment of the Attorney is necessary for the applicant to adequately perform its duties, including formulating and prosecuting confirmation of a reorganization plan.
4. The Attorney has been selected because it has considerable experience in representing debtors in bankruptcy.
5. The services to be rendered by the Attorney include, but are not limited to: (a) advising the debtor of its rights and obligations under the bankruptcy code, (b) assisting the debtor in preparation of the schedules and other required pleadings, (c) representing the debtor at the meeting of creditors and other examinations, (d) preparing all necessary applications, motions, answers, responses, and similar pleadings, and (e) assisting the debtor in the formulation and prosecution of confirmation of a reorganization plan.
6. The Attorney has no connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.
7. The Attorney does not hold an adverse interest to the estate, does not represent an adverse interest to the estate, and does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which they will be retained under 11 U.S.C. § 327(a).
8. A declaration by the Attorney is attached as Exhibit A.

9. The proposed arrangement for compensation is outlined in the Attorney's disclosure required by 11 U.S.C. § 329(a) and Fed. R. Bankr. P. 2016(b), which is attached as Exhibit B.

10. The Applicant respectfully requests authorization to employ the Attorney to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

**NOW, THEREFORE**, the Applicant asks this Court to grant relief in the form of order attached and to grant such other relief in its favor as may be necessary and proper under the law.

Date: October 27, 2023

TRI-STATE PAPER, INC.  
*Debtor*

By: /s/ John Petaccio  
John Petaccio  
Principal

**Verification**

I am the principal of Tri-State Paper, Inc.. I verify that all factual statements in this Application are true and correct to the best of my knowledge, information, and belief. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: October 27, 2023

/s/ John Petaccio  
John Petaccio